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UNITED STATES BANKRUPTCY COURT  
SAN FRANCISCO, CA

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Attorneys for MICHAEL MARROQUIN

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

and

PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas & Electric Company  
☒ Affects both Debtors

\*All papers shall be filed in the Lead Case  
No. 19-30088 (DM)

Case No. 19-30088-DM

Chapter 11

RS No. LKW-002

Date: December 11, 2019

Time: 10:00 a.m.

Place: 450 Golden Gate Avenue, 16<sup>th</sup> Floor  
San Francisco, CA

Judge: Honorable Dennis Montali

Objection Deadline: December 6, 2019  
Time: 4:00 p.m. (Pacific Time)

**PROOF OF SERVICE BY MAIL**

I, Trinetta Lidgett, declare:

1. I am employed in Kern, County, CA by a member of the bar of this court at whose direction the service was made. I am over the age of 18 and not a party to the within action. My business address is 4550 California Avenue, Second Floor, Bakersfield, CA 93309.

2. I served the following documents by First-Class Mail on the Standard Party List on November 5, 2019 by placing true copies thereof enclosed in a sealed envelope in the U.S. Mail at Bakersfield, California addressed as indicated on the attached Exhibit A:

A. **NOTICE OF HEARING ON MOTION TO ABSTAIN AND FOR RELIEF FROM  
AUTOMATIC STAY TO PERMIT LAWSUIT TO PROCEED TO TRIAL AND  
CONCLUSION,**

- 1     **B.     MOTION TO ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO**  
2     **PERMIT LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION,**
- 3     **C.     EXHIBITS TO MOTION TO ABSTAIN AND FOR RELIEF FROM**  
4     **AUTOMATIC STAY TO PERMIT LAWSUIT TO PROCEED TO TRIAL AND**  
5     **CONCLUSION,**
- 6     **D.     DECLARATION OF DANIEL RODRIGUEZ IN SUPPORT OF MOTION TO**  
7     **ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO PERMIT**  
8     **LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION,**
- 9     **E.     DECLARATION OF LEONARD K. WELSH IN SUPPORT OF MOTION TO**  
10    **ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO PERMIT**  
11    **LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION, and**
- 12    **F.     RELIEF FROM STAY COVER SHEET**

13           2.     I served the following documents by email on the Master Service List on  
14     November 5, 2019 addressed as indicated on the attached Exhibit B:

- 15     **A.     NOTICE OF HEARING ON MOTION TO ABSTAIN AND FOR RELIEF FROM**  
16     **AUTOMATIC STAY TO PERMIT LAWSUIT TO PROCEED TO TRIAL AND**  
17     **CONCLUSION,**
- 18     **B.     MOTION TO ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO**  
19     **PERMIT LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION,**
- 20     **C.     EXHIBITS TO MOTION TO ABSTAIN AND FOR RELIEF FROM**  
21     **AUTOMATIC STAY TO PERMIT LAWSUIT TO PROCEED TO TRIAL AND**  
22     **CONCLUSION,**
- 23     **D.     DECLARATION OF DANIEL RODRIGUEZ IN SUPPORT OF MOTION TO**  
24     **ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO PERMIT**  
25     **LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION,**
- 26     **E.     DECLARATION OF LEONARD K. WELSH IN SUPPORT OF MOTION TO**  
27     **ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO PERMIT**  
28     **LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION, and**
- F.     RELIEF FROM STAY COVER SHEET**

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I declare under penalty of perjury that the foregoing is true and correct.



Date: November 5, 2019

By: /s/ Trinette Lidgett  
TRINETTE LIDGETT

EXHIBIT "A"

PG&E Corporation and Pacific Gas and Electric Company Attn.: Janet Loduca 77 Beale Street P.O. Box 770000 San Francisco, CA 94105 (Debtors)	U.S. Nuclear Regulatory Commission Attn: General Counsel Washington, D.C. 20555-0001
Stephen Karotkin, Esq. Jessica Liou, Esq. Matthew Goren, Esq. Weil, Gotshal & Manges, LLP 767 Fifth Avenue New York, NY 10153 (Counsel or Debtors)	Tobias Keller, Esq. Jane Kim, Esq. Keller & Benvenuti, LLP 650 California Street, Suite 1900 San Francisco, CA 94108 (Counsel for Debtors)
Kristopher M. Hansen, Esq. Erez E. Gilad, Esq. Matthew G. Garofalo, Esq. Stroock & Stroock & Lavan, LLP 180 Maiden Lane New York, NY 10038-4982 (Counsel for the administrative agent under Debtors' financing facility)	Frank a. Merola, Esq. Stroock & Stroock & Lavan, LLP 2029 Century Park East Los Angeles, CA 90067-3086 (Counsel for the administrative agent under Debtors' financing facility)
Eli J. Vonnegut, Esq. David Schiff, Esq. Timothy Graulich, Esq. Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017 (Counsel for the collateral agent under Debtors' DIP financing facility)	Alan W. Kornberg, Esq. Brian S. Hermann, Esq. Walter R. Rieman, Esq. Sean A. Mitchell, Esq. Neal P. Donnelly, Esq. Paul, Weiss, Rifkind, Wharton & Garrison 1285 Avenue of the Americas New York, NY 10019-6064 (Counsel to the California Public Utilities Commission)
James L. Snyder, Esq. Timothy Laffredi, Esq. Office of the United States Trustee for Region 17 450 Golden Gate Avenue, 5 <sup>th</sup> Floor Suite 05-0153 San Francisco, CA 94102	Danielle A. Pham, Esq. U.S. Department of Justice 1100 L Street, NW, Room 7106 Washington, DC 20005 (Counsel for United States of behalf of the Federal Energy Regulatory Commission)

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Dennis F. Dune, Esq. Sam A. Khalil, Esq. Milbank, LLP 55 Hudson Yards New York, NY 10001-2163 (Counsel for the Official Committee of Unsecured Creditors)	Paul S. Aronzon, Esq. Gregory A. Bray, Esq. Thomas R. Kreller, Esq. Milbank, LLP 2029 Century park East, 33 <sup>rd</sup> Floor Los Angeles, CA 90067 (Counsel for the Official Committee of Unsecured Creditors)
Eric Sagerma, Esq. Cecily Dumas, Esq. Baker & Hostetler, LLP 11601 Wilshire Blv.d, Suite 1400 Los Angeles, CA 90025-0509 (Counsel for the Official Committee of Tort Claimants)	

DESCRIPTION	NAME	NOTICE NAME	ADDRESS1	ADDRESS2	CITY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
Counsel to Mirna Tretvenk, including Other Fire Victim Tort Claimants	ADLER LAW GROUP, APC	Attn: E. Elliot Adler, Esq., Geoffrey E. Marr, Esq., & Omeed Latifi, Esq.	402 West Broadway, Ste. 860		San Diego	CA	92101		619-531-8700	619-342-9600	Eadler@TheAdlerFirm.com gemarr59@hotmail.com burnner@TheAdlerFirm.com latifi@TheAdlerFirm.com
Counsel for Mirna Tretvenk, including Other Fire Victim Tort Claimants	ADLER LAW GROUP, APC	Attn: E. Elliot Adler, Geoffrey E. Marr, Brittany S. Zimmer, Omeed Latifi	402 West Broadway		San Diego	CA	92101		619-531-8700	619-342-9600	latifi@TheAdlerFirm.com gemarr59@hotmail.com burnner@TheAdlerFirm.com latifi@TheAdlerFirm.com
HEALTH/STEM/WEST, a California non-profit religious corporation	ADVENTIST HEALTH SYSTEM/WEST	ATTN: ROBERT L. LAYTON	ONE Adventist Health Way		Roseville	CA	95661		916-406-1577		layton1@ah.org
Counsel for Aera Energy LLC, Midway Sunset Congregation Company	Aera Energy, LLC	Attn: Ron A. Symm	10000 Ming Avenue 601 West Fifth Street, Suite 300		Bakersfield	CA	93311		661-665-5791		RASymm@aeraenergy.com
COUNCIL TO TRANSMOUNTAIN PIPELINE COMPANY, LLC	AKEMAN LLP	Attn: EVELINA GENTRY Attn: JOHN E. MITCHELL and YELENA ARCHIVAN	2001 Ross Avenue, Suite 3600		Los Angeles	CA	90071		213-688-9500	213-627-6342	evelina.gentry@akeman.com yelenamitchell@akeman.com
Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	AKERMAN LLP	Attn: ASHLEY VINSON CRAWFORD	580 California Street		San Francisco	CA	94104		415-765-9500	415-765-9501	acrawford@akingump.com
Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Attn: Gump Strauss Hauer & Feld LLP	Attn: David P. Simmonds	1999 Avenue of the Stars		Los Angeles	CA	90067		310-229-1000	310-229-1001	dsimmonds@akingump.com mstaner@akingump.com kldzengoff@akingump.com dbotter@akingump.com
Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Attn: Gump Strauss Hauer & Feld LLP	Attn: Michael S. Stamer, Ira S. Diengoff, David H. Botter	One Bryant Park		New York	NY	10036		212-872-1000	212-872-1002	shiggins@andrewshornton.com jctandrewshornton.com 32@andrewshornton.com
Counsel to Adelphia, Inc., Counsel to Bennett Lane Winery LLC	ANDREWS & THORNTON	Attn: Anne Andrews, Sean T. Higgins, and John C. Thornton	4701 Von Karman Ave		Newport Beach	CA	92660		949-748-1000	949-315-5540	Andrew.Silfen@arentfox.com Ben.Brownstein@arentfox.com Jordan.Renert@arentfox.com
Counsel for BOFC, MA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	Attn: Andrew J. Silfen, Beth M. Brownstein, Jordana L. Renert	1301 Avenue of the Americas		New York	NY	10019		212-484-3900	212-484-3990	andy.kong@arentfox.com christopher.wong@arentfox.com
Counsel for BOFC, MA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	Attn: Andy S. Kong and Christopher K.S. Wong	555 West Fifth Street		Los Angeles	CA	90013-1065		213-629-7400	213-629-7401	brun.john@arnoldporter.com steven.fruchter@arnoldporter.com
Counsel for AT&T	ARENT FOX LLP	Attn: Adam Orndelgish Arnold & Porter Kaye Scholer Fruchter, Esq.	555 West Fifth Street 250 West 55th Street One AT&T Way, Room 3A115		Los Angeles New York Bedminster	CA NY NJ	90013-1065 10019 07921		213-629-7400 212-836-8000 908-234-3318	213-629-7401 212-836-8689 832-213-0157	Aram.Orndelgish@arentfox.com brian.john@arnoldporter.com jhs786@att.com
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Counsel for NRG Energy Inc., Clearway Energy, Inc., and Clearway Energy Group LLC	BAKER & HOSTETLER, LLP	Attn: C. Lukey McDowell, Ian E. Roberts, Kevin Chiu	2001 Ross Avenue		Dallas	TX	75201		214-933-6500		ian.roberts@bakerbotts.com Kevin.Chiu@bakerbotts.com
Counsel for NRG Energy Inc., Clearway Energy, Inc., and Clearway Energy Group LLC	Baker Botts LLP	Attn: Navi S. Dhilon	101 California Street		San Francisco	CA	94111		415-291-6200		Navi.Dhilon@BakerBotts.com
Counsel for Phillips and Jordan	Baker, Donelson, Bearman, Caldwell & Berkeowitz, PC	Attn: John H. Rowland	211 Commerce Street		Nashville	TN	37201		615-726-5544	615-744-5544	jrowland@bakerdonelson.com



DESCRIPTION	NAME	NOTICE NAME	ADDRESS1	ADDRESS2	QTY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
Counsel for Phillips and Jordan, Inc., Counsel for ARTM, Counsel for TTR Subsistence, Inc., Counsel for Shelton Companies, Inc.	Baker, Donelson, Bearman, Caldwell & Berkeowitz, PC	Attn: Lacey E. Rochester, Jan M. Hayden	201 St. Charles Avenue, Suite 3600		New Orleans LA	70170			504-566-5292; 504-566-5200	504-656-4000	lrochester@bakerdonelson.com jhayden@bakerdonelson.com
UBENCO Limited and Louisiana Energy Services, LLC	Ballard Spahr LLP	Attn: Brian D. Huben	2029 Century Park East Suite 800		Los Angeles CA	90067-2909			424-204-4353	424-204-4350	huben@ballardspahr.com
Counsel to Campos EFC, LLC	BALLARD SPAHR LLP	Attn: Brian D. Huben, Esq.	2029 Century Park East Suite 800		Los Angeles CA	90067-2909			424-204-4400	424-204-4350	huben@ballardspahr.com
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Counsel to Realty Income Corporation Counsel to Campos EFC, LLC	BALLARD SPAHR LLP	Attn: Stacy H. Rubin Attn: Theodore J. Hart, Esq.	One Summerlin Drive, Suite 900 Suite 2300		Las Vegas NV	89135-2958			702-471-7000		rubins@ballardspahr.com
Counsel for Bank of America, N.A.	Bank of America	Attn: John McCutcher	Mail Code: NY-100-21-01 One Bryant Park		Denver CO	80202				303-296-3956	harr@ballardspahr.com
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Counsel for City of Morgan Hill Counsel to Majestic Mal Baggio, et al., creditors and plaintiffs in Baggio, et al. v. PG&E Corporation, et al., case number CMC- 19-554581	Barton, Klugman & Cetting LLP	Attn: Terry L. Higham, Thomas E. McCurm, Christopher D. Higgins	350 South Grand Avenue, Suite 2200		Los Angeles CA	90071-3485			213-621-4000	213-625-1832	terryh@bartonklugman.com tmcgur@bartonklugman.com chiggins@bartonklugman.com thigham@bartonklugman.com
Counsel for Dan Clarke Counsel for Infosys Limited, Counsel for ACRT, Inc.	BELVEDERE LEGAL PC	Attn: Ronald L.M. Goldman, Diane Margr Moore	10940 Wilshire Boulevard, 17th Floor		Los Angeles CA	90024			310-207-9233	310-820-7444	goldman@baumhedlundlaw.com dmarfermore@baumhedlundlaw.com
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Counsel for Valley Clean Energy Alliance	BEST BEST & KRUEGER LLP	Attn: Harrie Steiner	500 Capitol Mall Suite 1700		Sacramento CA	95814			949-474-1880	949-313-5029	csimon@bergerkahn.com
Counsel to Creditor Recology, Inc.	BILSON, BERGEN & SCHWAB	Attn: Lawrence M. Schwab, Esq. and Kenneth T. Law, Esq.	633 Menlo Ave., Suite 100		Menlo Park CA	94025			916-325-4000	916-325-4010	harrie.steiner@bbhlaw.com
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Co-Counsel to Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric	Boutin Jones Inc.	Attn: Mark Gorton	Suite 1500		Sacramento CA	95814					ngorton@boutinjoness.com
Counsel to unsecured asbestos personal injury creditor Everett Freeman Weising, Jr.	BRAYTON-PURCELL LLP	Attn: Alan R. Brayton, Esq. and Bryn G. Letch, Esq.	351 California Street Tenth Floor		San Francisco CA	94104			415-599-0210	415-276-1808	hagley@braunhagley.com theodore@braunhagley.com kwasniewski@braunhagley.com levine@braunhagley.com
Counsel for MDH Inc. (Ida Accu-Sore Directional Drilling), Veteran Power, Inc. (Ida Kortek Manufacturing Company) Kortek Manufacturing Company Association, Counsel for Oracle America, Inc.	Brothers Smith LLP	Attn: Mark V. Isola	2222 Rush Landing Road P.O. Box 5169		Novato CA	94946-6169			415-898-1555	415-898-1247	blsctd@braytonlaw.com
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	Buchalter, A Professional Corporation	Attn: Valerie Banner Peo, Shawn M. Christensen	55 Second Street 17th Floor		San Francisco CA	94105-3493			415-227-0900	415-227-0770	grouse@buchalet.com schristensen@buchalet.com vbannerpeo@buchalet.com arocles.aguiar@cpuc.ca.gov
California Public Utilities Commission Commission CHEVRON PRODUCTS COMPANY, A DIVISION OF CHEVRON U.S.A. INC.	California Public Utilities Commission	Attn: Arcelos Aguilar, Geoffrey Drymmyds, and Candace Morey	505 Van Ness Avenue 172110		San Francisco CA	94102			415-703-2015	415-703-2262	geoffrey.drymmyds@cpuc.ca.gov candace.morey@cpuc.ca.gov melanietruz@chevron.com marmstrong@chevron.com

DESCRIPTION	NAME	NOTICE NAME	ADDRESS1	ADDRESS2	CITY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
Counsel to Liberty Mutual Insurance Company	Choate, Hall & Stewart LLP	Attn: Douglas R. Gooding	Two International Place		Boston	MA	02210		617-248-5277	617-502-5277	dgooding@choate.com
Counsel to Liberty Mutual Insurance Company	Choate, Hall & Stewart LLP	Attn: Jonathan D. Marshall	Two International Place		Boston	MA	02110		617-248-4799	617-502-4799	jmarshall@choate.com
Counsel to Sabin	CRR Law, LLP	Attn: Kristine Takurayan	1800 Century Park East, 14th Floor		Los Angeles	CA	90067		310-400-1110	310-400-0202	ctakurayan@cklaw.com
Interested Party California Community Choice Association	Chart & Trewhick	Attn: Kimberly S. Winick	800 Wilshire Boulevard	12th Floor	Los Angeles	CA	90017		213-629-5700	213-624-9441	kwinick@chartrev.com
Counsel to XL Insurance America, Inc., Albertsons Companies, Inc., Safeway Inc., Carlin Specialty Insurance Company, David W. Maehl, Rionda J. Maehl, Starr Surplus Lines Insurance Company, Chubb Custom Insurance Company, General Security Indemnity Company of Arizona (SSINDA), Market Bermuda Limited, Ashford Inc., Ashford Hospitality Trust, Inc.	Chausen Miller P.C.	Attn: Michael W. Goodin	17901 Van Korman Avenue	Suite 550	Irvine	CA	92614		949-260-3100	949-260-3190	mngoodin@clausen.com
Counsel for BlueMountain Capital Management, LLC	Cleary Gottlieb Steen & Hamilton LLP	Attn: Lisa Schweitzer, Margaret Schierberl	One Liberty Plaza 111 East Broadway, 11th Floor		New York	NY	10005		212-255-2000	212-225-3999	lschweitzer@cgsb.com mschierberl@cgsb.com
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Counsel for Gowans Construction Company Inc., Calaveras Telephone Company, Kernan Telephone Co., Pinnades Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., Volcano Telephone Company and TDS Telecom	Commonwealth of Pennsylvania Department of Labor and Industry		Collections Support Unit	Room 702	Harrisburg	PA	17121		717-787-7627	717-787-7671	ra-l-wcs@bankrupt.state.pa.us
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Individual Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 4955, Pursuant to the terms of the Court's Case Management Order No. 1	COREY, LUZAICH, DE GHETALDI & RIDOLE LLP	Attn: Darin de Ghetaldi, Amanda L. Riddle, Steven M. Berli, Sumble Manzoor	700 El Camino Real	PO Box 659	Millbrae	CA	94030-0669		650-871-5666	850-871-4144	ldecalifano@cpmllegal.com acordova@cpmllegal.com abodgett@cpmllegal.com
Attorney for County of Sonoma	Cortner, Pire & McCarthy, LLP	Attn: Frank M. Pire, Alison E. Cordova, Abigail D. Blodgett	San Francisco Airport Office Center County Administration Center	840 Malcolm Road, Suite 200 575 Administration Drive, Room 105A	Burlingame Santa Rosa	CA	94010 95403		650-697-6000 707-565-2421	650-697-0577	fpire@cpmllegal.com acordova@cpmllegal.com abodgett@cpmllegal.com
Counsel for Valley Clean Energy Alliance	COUNTY OF YOLO	Attn: Tamara Curtis	625 Court Street	Room 201	Woodland	CA	95695		530-666-8278	530-666-8279	tamara.curtis@sonoma-county.org
Counsel to Liberty Mutual Insurance Company	Coxen O'Connor	Attn: Eric May	101 Montgomery Street	Suite 1400	San Francisco	CA	94101		415-644-0914	415-644-0978	eric.may@yolocounty.org fsmith@cozen.com
Counsel to Renaissance Reinsurance LTD.	Coxen O'Connor	Attn: Mark E. Flieger	1201 North Market Street	Suite 1001	Wilmington	DE	19801		302-295-2087	302-295-2013	mflieger@cozen.com
Counsel for Creditors and Parties-in-Interest NEXANT	Crowell & Moring LLP	Attn: Mark D. Plevin, Brendan V. Mulvan	Three Embarrasadero Center, 26th Floor		San Francisco	CA	94111		415-986-2800	415-986-2827	mplevin@crowell.com bmulvan@crowell.com
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In re: P&GE Corporation, et al.  
Master Service List  
Case No. 19-30088

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